

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

SHUBH HOTELS PITTSBURGH, LLC,

Debtor.

DR. KIRAN PATEL, DR. PALLAVI
PATEL, and PITTSBURGH GRAND, LLC.

Bankruptcy Case No. 10-26337 JAD

Chapter 11

Judge Jeffrey A. Deller

Related Docket No.: 799

Hearing Date and Time: March 29, 2011
10:00 a.m.

**OBJECTION TO SECOND AMENDED DISCLOSURE STATEMENT IN
CONNECTION WITH FIRST AMENDED PLAN OF REORGANIZATION DATED
MARCH 8, 2011**

SHUBH HOTELS, LLC (“HOTELS”), by and through undersigned counsel, hereby files this Objection and states as follows:

1. Procedural History: On September 9, 2010, Shubh Hotels Pittsburgh, LLC. filed a voluntary petition pursuant to Chapter 11 of the Bankruptcy Code. Pittsburgh Grand, LLC and Dr. Kiran Patel filed their Second Amended Disclosure Statement in Connection with Second Amended Plan of Reorganization Dated March 28, 2011 (the “Second Disclosure Statement”). HOTELS filed a proof of claim in the amount of \$15,227,670.09.

2. Objection: HOTELS objects to the Second Disclosure Statement insofar as it 1) fails to identify Atul Bisaria, Mihi Bisaria, Jai Lalwani, Vani Lalwani, and HOTELS as class participants, 2) improperly provides releases by Atul Bisaria, Mihi Bisaria, Jai Lalwani, Vani Lalwani, and HOTELS without identifying them as class participants and without their written

consent and 3) fails to properly identify Shubh Hotels Pittsburgh Investments, LLC including, but not limited to, its members and its interests in Shubh Hotels Pittsburgh, LLC.

WHEREFORE, SHUBH HOTELS, LLC objects to the Second Disclosure Statement and requests this Court enter an order mandating its amendment and for any and all further such relief as this Court may deem appropriate.

GRUMER & MACALUSO, P.A.

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By: \s\ Keith T. Grumer, Esq.

KEITH T. GRUMER

FL. Bar No: 504416

Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served this 4th day of April 2011, *via* ECF/CM to all parties hereto.

By: \s\ Keith T. Grumer, Esq.

KEITH T. GRUMER